

1 Marjorie E. Kratsas
Nevada Bar No. 12934
2 mkratsas@wshblaw.com
WOOD, SMITH, HENNING & BERMAN LLP
3 2881 Business Park Court, Suite 200
Las Vegas, Nevada 89128-9020
4 Phone: 702.251.4100 ♦ Fax: 702.251.5405
Attorneys for Defendant Warm Springs Road
5 *CVS, LLC, and CVS Pharmacy*

6
7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 *****

10 SUSAN ENGEL, individually,

11 Plaintiff,

12 v.

13 WARM SPRINGS ROAD CVS, LLC, a
Nevada limited liability company; CVS
14 PHARMACY, INC. a Delaware corporation;
DOES I-V; and ROE CORPORATIONS I-V,
15 inclusive,

16 Defendants.

Case No. 2:23-cv-01652-JCM-BNW

**STIPULATION AND ORDER TO
CONDUCT LIMITED DISCOVERY
AFTER THE CLOSE OF DISCOVERY**

17 Plaintiff SUSAN ENGEL, individually, and Defendants WARM SPRINGS ROAD CVS,
18 L.L.C., and CVS PHARMACY, INC., (hereinafter collectively referred to as the “Defendants”), by
19 and through their respective counsel, hereby enter into this Stipulation and Order to Conduct Limited
20 Discovery after the Close of Discovery as follows:

21 The close of discovery is November 11, 2024. On October 28, 2024, Plaintiff's counsel
22 emailed a Notice of Taking Deposition of Defendants' FRCP 30(b)(6). The Notice of Deposition
23 was unilaterally set for November 11, 2024. The Notice for Deposition contained 30 Topics, which
24 in part, have been objected to. It is anticipated that multiple designees will be identified to cover
25 respective Topics. It is logistically impossible to identify, coordinate, prepare, and present the
26 respective Designees within the time frame that the unilateral Notice and the close of discovery
27 deadline allow.
28

1 The parties herein, therefore, agree and request that the Court hereby ORDER, ADJUDGE,
2 and DECREE as follows:

3 The depositions of the Designees identified to offer testimony pursuant to the Notice of
4 Taking Deposition of Defendants' FRCP 30(b)(6), only, are permitted to be conducted after the
5 November 11, 2024, close of discovery deadline. The deadline to conduct the depositions is March
6 11, 2025.

7 All other prescribed deadlines will remain as previously ordered.

8 **IT IS SO STIPULATED**

9 DATED this 7th day of November, 2024

10 WOOD, SMITH, HENNING & BERMAN LLP

11
12 By /s/ Marjorie E. Kratsas
13 Marjorie E. Kratsas
14 Nevada Bar No. 12934
15 2881 Business Park Court, Suite 200
16 Las Vegas, Nevada 89128-9020
17 Tel. 702.251.4100
18 *Attorneys for Defendant Warm Springs Road CVS,*
19 *LLC, and CVS Pharmacy*

20 DATED this 7th day of November, 2024 BENSON ALLRED

21 By /s/ Joshua L. Benson
22 Joshua L. Benson
23 Nevada Bar No. 10514
24 333 N. Rancho Drive, Suite 420
25 Las Vegas, Nevada 89106
26 Tel. 702.820.0000
27 *Attorney for the Plaintiff*

28 **ORDER**

Pursuant to the foregoing stipulation and order of counsel for all parties, good cause
appearing therefore; IT IS HEREBY ORDERED that this Stipulation and Order to allow the
depositions of Defendants' Designees to Plaintiff's Notice of Taking Deposition of Defendants'

1 FRCP 30(b)(6) is GRANTED. Plaintiff may take the depositions, only, of the Designees after the
2 November 11, 2024, close of discovery and prior to March 11, 2025.

3 DATED this 8 day of November, 2024

4
5 
6 UNITED STATES MAGISTRATE JUDGE

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

WOOD, SMITH, HENNING & BERMAN LLP
2881 BUSINESS PARK COURT, SUITE 200
LAS VEGAS, NEVADA 89128-9020
TELEPHONE 702.251.4100 ♦ FAX 702.251.5405